

BEFORE THE
POSTAL REGULATORY COMMISSION
WASHINGTON, DC 20268

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In the Matter of:

Swaledale, Iowa 50477
Post Office State ZIP Code

Docket No: A2012-52

POSTAL REGULATORY
COMMISSION
OFFICE OF THE SECRETARY

Scott Bonner, Friends of Swaledale, Petitioner(s)

PARTICIPANT STATEMENT

1. Petitioner(s) are appealing the Postal Service's Final Determination concerning the Swaledale post office. The Final Determination was posted 10-17-2011.
(date)

2. In accordance with applicable law, 39 U.S.C. § 404(d)(5), the Petitioner(s) request the Postal Regulatory Commission to review the Postal Service's determination on the basis of the record before the Postal Service in the making of the determination.

3. Petitioners: Please set out below the reasons why you believe the Postal Service's Final Determination should be reversed and returned to the Postal Service for further consideration. (See pages of the Instructions for an outline of the kinds of reasons the law requires us to consider.) Please be as specific as possible. Please continue on additional paper if you need more space and attach the additional page(s) to this form.

See attached additional paper

Attachment to PRC Form 61.

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United States Postal Code , Title 39, Part 1, Chapter 1, § 101 (b) states: "The Postal Service shall provide a maximum degree of effective and regular postal service to rural areas, communities and small towns where post offices are not self-sustaining. No post office shall be closed for operating at a deficit. It is the specific intent of the Congress that effective postal service be insured to residents of both urban and rural communities."

In addition to other reasons spelled out here below, this basic tenant of the US Postal Code is the main reason that the rural post office in Swaledale, Iowa 50477 should remain open. This, and concerns that this and other proper USPS procedure for consideration of closure were not properly followed.

Other reasons the Postal Services Final Determination should be reversed and the Swaledale Post Office remain open:

Local Business "Doors Inc." expressed plans to expand their business and that if there was any doubt in the postal service's ability to keep that office open, the business might not expand in Swaledale and perhaps expand elsewhere, which would very negatively affect Swaledale. The company indicated they may look at other locations as well as other parcel services. Other businesses may opt to decide in the same manner.

There are no retail businesses in Swaledale for establishment of a Village Post Office concept. Other communities may be fine with a Village Post Office concept in lieu of a post office, but Swaledale has no such options, which again would be a negative impact to the community.

Businesses need to receive mail early in the day and also need postal services near the end of the business day. Sending an employee several miles to some other community in mid-afternoon is a costly detriment to any business at a time when we need to be encouraging any businesses.

The Postal Service's decision to provide delivery and retail services under the administrative responsibility of the Rockwell, Iowa Post Office is very undesirable. The Rockwell office has very limited hours and is not handicap accessible and this causes unnecessary hardship to many residents and customers of the Swaledale office. The office will simply not be able to provide effective and regular service to these citizens. The Swaledale office is handicap accessible.

Swaledale has a large number of elderly residents who are unable to travel to Rockwell or Thornton for routine postal services since no public transportation is available. This places an unfair burden on senior citizens and does not provide them with regular and effective service.

Under the Economic Savings section of the "determination to close", the Postal Service factors

in salary and benefits of a Postmaster to this facility, instead of the same expense of a working OIC or PMR. This office has not had a Postmaster since 2007 so this unfairly inflates the expenses and economic savings to the Postal Service.

PO-101 Section 242, Justification for Discontinuance, An example of justification includes *"The postmaster position is vacant. Service needs in the community have declined and the recommended alternate service would provide as good or better service to the community. (Include documentation in the official record to support such statements.)"* No such documentation exists in the official record that would support a claim that our replacement service will be as good or better service to the community.

The Postal Service's decision to close our office and provide rural delivery raises questions concerning the sanctity and security of the mail and the risks involved in the handling of mail by non-career employees. There will be inefficiencies in purchasing stamps and money orders, as well as sending time sensitive mail such as certified letters, registered letters, city water lab samples, and COD's. Conducting postal business curbside with the rural carrier can not under any circumstances be considered regular and effective service.

The Swaledale Post Office is one of the three public notice posting places established by ordinance for the City of Swaledale. Removal of this office and its public bulletin board leaves the city without a third common gathering place to post public meeting notices as well as city council minutes, which we are required to do by law.

PO-101, Section 222, Preproposal Investigation, requirement that postal officials *"meet with civic leaders, such as the mayor and local business managers. Working with the Facilities Service Office, look for potential alternate quarters and community Post Office (CPO) sites. Inquire into community interest and availability of quarters for contracting a CPO"*. These meetings never took place.

Labor savings from closing the Swaledale office is estimated to be \$32,394 annually, and would be considerably less if accurate current salary figures are used. Closing the office just takes the wages from the OIC and gives an additional \$11,885 to the rural carrier, sacrificing critical services to residents and businesses in town in the process.


Swaledale's rental rates are amongst the lowest in the State. Keeping the Swaledale Post Office option, from a rental expense perspective is not a hardship on the USPS.

Other options to the closure of the Swaledale Post Office do not seem to have been considered. Neighboring communities, which may also be near the consideration for closure process, could be possibly combined to share a Postmaster to handle the duties at 2 or more Post Offices, saving the valuable resource that the Post Office provides each community, while also saving the USPS money. These options do not appear to have been considered.

Because of the above mentioned reasons, the Swaledale Post Office should remain open to serve the citizens of Swaledale, or at least merit further and extensive re-evaluation and investigation into the reasons and statistics cited for the closure of the Swaledale Post Office.

It is our hope that upon further review, the Swaledale Post Office can remain open to serve the needs of the Swaledale community.

Thank you,



Scott Bonner

Friends of Swaledale

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